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June 5, 2020

Hon. Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square; Courtroom: 1305
New York, NY 10007

RE: *Roc Nation, LLC v. HCC International Insurance Company, PLC*; Case No.: 1:19-cv-00554

Dear Judge Engelmayer:

We write to request permission, pursuant to Section 4(B) of Your Honor's Individual Rules and Practices, to file under seal four exhibits and an unredacted version of Roc Nation's response to HCC's letter motion publically filed at ECF No. 123.

The Stipulated Confidentiality Agreement and Protective Order in this case [ECF No. 43] (the "Protective Order") allows counsel to designate deposition testimony as Confidential under Section 4. This obligates the party to file that confidential testimony under seal. Roc Nation's response attaches and cites the deposition testimony of two witnesses: one Roc Nation witness and one third-party witness. Both transcripts are marked confidential. As a result, Roc Nation is requesting to file Exhibits K & N to its letter response under seal.

Similarly, Section 2 of the Protective Order permits any party to designate documents as "Confidential" where necessary to protect its interests in proprietary or otherwise sensitive non-public information. Exhibit P is such a document, containing proprietary and sensitive information of Roc Nation and the other signatories to the document. It also contains an internal Confidentiality obligation in Section 6 of that document which obligates Roc Nation to make this request.

In addition, portions of Exhibit M, the declarations of Roc Nation's outside counsel, and the letter motion itself contains discussions of certain confidential negotiations after Jordan Feldstein's death and the confidential, non-public Exhibit P. This information is specifically the type of non-public proprietary information that is confidential under the terms of the Protective Order. Given that HCC has challenged the interests of the negotiating parties, Roc Nation has made an attempt to limit its redactions in this regard to the extent necessary.

Finally, Roc Nation intends to file Exhibit No. I with redactions, and requests to file it under seal without redactions. Exhibit I contains Roc Nation's attorney's privilege log, which has a number of email subject lines containing confidential and non-public information relating to the confidential material described above. The Protective Order is designed to protect. The redactions in Exhibit I are the same redactions submitted by HCC in the document filed at ECF No. 123-1 at 77-117.

In connection with this application, Roc Nation also requests approval to redact citations to and language discussing the confidential information described above in its letter response and to file the unredacted version of its response under seal.

Good cause exists for granting this request. The request is submitted under the terms and for the reasons set forth the Protective Order, and the parties understood that their confidentiality designations would apply when

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they were exchanging information and taking depositions in order to avoid objections preventing the disclosure of material that would be relevant in discovery and for settlement discussions, but which the parties would not agree to make publically available. Furthermore, Roc Nation has attempted to narrow this request to the extent possible.

Very truly yours,

/s/ Amber Finch
Amber S. Finch

Granted.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

June 9, 2020